

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
)	
Advanced Television Systems)	MB Docket No. 87-268
and Their Impact upon the)	
Existing Television Broadcast)	
Service)	
)	
)	
)	

SEVENTH FURTHER NOTICE OF PROPOSED RULE MAKING

Adopted: October 10, 2006 **Released: October 20, 2006**

Comment Date: January 11, 2007

ICA Broadcasting I, Ltd., licensee of KOSA-TV, analog Channel 7 and
Special Temporary Authority for KOSA-DT, Channel 31, Odessa, Texas
herewith states

It's opinion on the proposed table of allotments and operating standards that
were

provided as attachments to the above mentioned proceeding.

In support of the comments it is necessary to list some historical points:

1. KOSA-TV was given a tentative digital channel (TDC) of 31 in the initial table of digital allotments in 1997-1998.
2. KOSA-DT channel 31 was constructed and has operated pursuant to an STA since May 24, 2002 and was found to have met the original May 2002 digital deadline for having constructed its digital facility.
3. Since the inception of the channel election process, KOSA-DT has elected to revert back to its original analog channel 7 position.
4. KOSA-DT stated on FCC form 381 that it would replicate coverage equal to its analog predecessor.

The licensee of KOSA-TV/DT believes that the proposed table significantly reduces the capabilities of KOSA-DT to provide service to its existing analog viewers post-transition at the allocated ERP of 7.53 Kw.

The licensee has questioned consultants regarding the maximum ERP that could be applied to Channel 7 operating digitally and has found that 160 Kw is the maximum allotted power available. The consultation confirmed that this proposed ERP had no areas of interference with any other facility, since

we are currently operating on Channel 7 in analog at our allotted ERP of 316 Kw.

We respectfully request the commission allot KOSA-DT Channel 7, Odessa, Texas a maximum ERP of 160 Kw for the February 17th, 2009 cessation of analog broadcasting.

An application for such allocated facilities would be filed after the application freeze is lifted.